

FILED

MAY 05 2014

JULIE A. RICHARDS, CLERK  
US DISTRICT COURT, EDNC  
BY                      DEP CLK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

NOs. 5:14-MJ-1347 through 5:14-MJ-1428  
NOs. 5:14-MJ-1430 through 5:14-MJ-1552  
NOs. 5:14-MJ-1554 through 5:14-MJ-1581  
NOs. 5:14-MJ-1759 through 5:14-MJ-1762

IN THE MATTERS OF THE SEIZURES        )  
OF LOCATIONS WITHIN THIS            ) MOTION TO SEAL  
DIVISION                                    )

The United States requests that the Applications, Affidavits, this Motion to Seal and any Order Sealing in the above captioned matters be sealed until further order of the court. The Applications and Affidavits contain information concerning an ongoing investigation being conducted by North Carolina Alcohol Law Enforcement (NCALE), the IRS, and the FBI. This information indicates the identities of potential targets and witnesses, as well as the focus of the Government's investigation and its theories regarding criminal liability. Disclosure of this information would alert other potential targets of the existence, scope, and details of the investigation. Disclosure, therefore, would pose a risk of destruction of additional evidence and may otherwise compromise the investigation currently being conducted. *See Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989).

WHEREFORE, the United States of America respectfully prays for the sealing of the above-referenced documents until further order of the court, except that copies may be maintained by the United States Attorney's Office and may be served on Special Agents and

other investigative and law enforcement officers of NCALE, the FBI, the IRS, and other state and federal government and contract personnel acting under the supervision of law enforcement.

Respectfully submitted this 5th day of May, 2014.

THOMAS G. WALKER  
United States Attorney

A handwritten signature in cursive script, reading "David A. Bragdon". The signature is written in dark ink and is positioned above a horizontal line.

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